

ALBERT SCHRAMM, W3MIV

8325 Chestnut Farm Lane
Ellicott City MD 21043-3309

Federal Communications Commission

In the matter of: Comment in support of **RM-11392**
via Electronic Comment Filing System

Wednesday, December 26, 2007

I strongly support this petition, and I ask that its contents be adopted and incorporated into the Part 97 Rules without delay.

As a matter of interest, I read those comments that had been filed prior to the time at which I submitted this comment. It is instructive to note that there is a planned campaign of misinformation being orchestrated by a few opponents of this petition. That this is the case is obvious from the repetition of the same "cut-and-paste" phrases and paragraphs that appear and reappear with dulling regularity. This is a concerted effort to undermine the serious purpose of the ECFS by a means as fraudulent as buying votes in an election. The premises being cited in these comments are false at best, hysterical at worst, and I quote them from the source of the crib sheet:

- 1. It is asserted that "the RM-11392 petition is very bad for the Amateur Radio Service."**

How is any attempt to clarify definitions and to seek to avoid the potential for greater interference considered "very bad" for the Amateur Radio Service? Does any one of the comments putting forth this bald assertion justify it with an explanation, not to even consider supporting it with evidence? They do not, because they cannot.

- 2. It is asserted that the petition "seeks to destroy 21st century digital data technology advancement in the Amateur Radio Service."**

Quite to the contrary, the petition seeks to remove ambiguities and institute the kinds of changes that permit operators of digital modes to operate more responsibly on the air. Amateur Radio Service frequencies, it cannot be stressed enough, are *shared* frequencies. Recent licensing changes may well bring many new operators onto our HF bands, and the provisions prayed for in this petition may actually

help *preserve* “21st century digital technology” for future licensees as operator density increases.

3. **It is asserted that this petition “is an attempt to kill innovation, technology advancement and emergency data communications in the Amateur Radio Service.”**

Such hysteria has no place in comments on Rule Making, and the repetition of such a puerile charge by commenters bespeaks an unseemly level of panic, as well as a willingness to participate in an attempt to cheapen the ECFS system of public input. Mark Miller has a clear track record of serious filings, all of which have sought to improve the Amateur Radio Service and expand the opportunities of licensed Amateurs to experiment and improve our Service.

4. **It is asserted that the “Amateur Radio Service’s automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.”**

It is fascinating how truth can be turned to fiction. More instructive, however, when the fiction is returned to simple fact. The current sub-bands set aside for automatic operations are, indeed, showing themselves to be too small for the traffic they are being asked to contain. This is clear from the rising numbers of interference complaints being generated by WinLink/PacTOR transmissions interfering with established packet transmissions. The simple fact of this crowding would argue far more eloquently for the petitioner’s appeal for a reduced maximum bandwidth, which would allow for simultaneous transmissions in parallel, rather than serial transmissions (stacked like airliners at O’Hare awaiting clearance), and tying up the available frequencies for a longer interval.

The very clear implication is that adopting the narrower maximum established in this petition might ease the problem within the sub-bands rather than exacerbate it. In paragraph 13, Miller makes a good case for a reduction in bandwidth with very little, if any, real reduction in spectrum efficiency.

If the current sub-bands are too small, it would be far better to adopt this petition and also to simultaneously enlarge those sub-bands somewhat, further sub-dividing them into 500-Hz and 1.5kHz maximums.

5. **It is further asserted that “several of the primary established HF emergency communications networks currently in service**

and utilized by thousands of Amateur Radio Operators in USA [sic] would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.”

This issue is adequately addressed in the paragraph cited in number 4. The established operations that utilize WinLink and SCS modems will lose very little in the way of efficiency. Under no circumstances would they be “totally eliminated or hobbled.” Again, such puerile hyperbole, wholly unsupported by any reference, is unsuitable to a serious discussion of Rule-change petitions.

6. Finally, as if the preceding, fantastic claims are not hyperbolic enough, it is asserted that “thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.”

Nothing more need be said with regard to the claims being made in some of the more lurid comments being filed in opposition to this petition. They range well beyond those highlighted above; well beyond reason, in fact, ranging from assertions that the Amateur Radio Service “relies upon international communications standards”(that somehow would be undermined by the contents of this petition) to the investment of “millions of dollars” by “thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5kHz bandwidth” that will be “taken away or rendered useless if the objectives of RM-11392 were to be adopted.”

Given the shared nature of the frequencies allocated for the use of the Amateur Radio Service, it is incumbent upon every licensed Amateur Radio operator to so conduct his or her operations as to offer the absolute *minimum* potential for interference to those other licensees who may be operating in close proximity and are already engaged in two-way radio operations, digital or analog. Adopting the provisions of this petition is a positive step in the direction of prudent spectrum management.

In closing, I urge the Commission to adopt the contents of this petition with all possible speed.

I thank the Commission for the opportunity to file this comment and make my views known.

Albert Schramm, W3MIV